

Frankfurt Kurnit Klein + Selz PC

Wendy Stryker

28 Liberty Street, New York, New York 10005

T (212) 705-4838 F (212) 593-9175

wstryker@fkks.com

June 20, 2024

The request is granted. The Court will separately issue a mediation referral order. Discovery pursuant to the Court's scheduling order is stayed until 30 days following the date that a mediation can be conducted. Within a week after the mediation conference, the parties shall provide a joint status update to the Court.

VIA ECF

Hon. John P. Cronan, USDJ
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED.

July 1, 2024
New York, New York



JOHN P. CRONAN
United States District Judge

Re: Coscia v. Audrey Halpern, MD, PC d/b/a The Manhattan Center for Headache & Neurology and Audrey Halpern, 23 CV 11066 (JPC)

Dear Judge Cronan:

On behalf of both parties in the above-referenced action (the "Action"), in which the Plaintiff asserts discrimination and harassment claims under Title VII and related state and city laws, the parties respectfully request a stay of the current Scheduling Order along with a referral to the Southern District Alternative Dispute Resolution program to allow the parties to explore mediation prior to expending further resources. The Scheduling Order currently contemplates a discovery cutoff of July 15, 2024. The parties have exchanged documents and information pursuant to the Pilot Discovery Protocols for Counselled Employment Cases, and have further exchanged document and interrogatory requests and responses, during which certain disputes have arisen but not yet been briefed to the Court including the propriety of producing documents responsive to claims that are the subject to a pending Motion to Dismiss the Amended Complaint and to Strike certain allegations. Prior to engaging in further motion practice and depositions, the parties jointly wish to be automatically referred for mediation pursuant to the Second Amended Standing Administrative Order. While Defendants have not yet filed an Answer (as a result of a pending motion), the parties have engaged in the "early exchange of targeted, core discovery" as specified in the Order.

Because the parties in this action are both individuals with limited resources, they also jointly request that discovery be stayed pending the opportunity to mediate, to allow them to direct their resources and attention in a cost efficient manner while they explore the possibilities of settlement.

For these reasons, the parties jointly request that this case: 1) be referred to mediation under the SDNY's Alternative Dispute Resolution program; and 2) that discovery pursuant to the Scheduling Order be stayed until 30 days following the date that a mediation can be conducted.

Hon. John P. Cronan, USDJ
June 20, 2024
Page -2

Respectfully submitted,

/s/ Wendy Stryker

Wendy Stryker

cc: Alex Rissmiller Esq. (arissmiller@rissmiller.com)
Khasim Lockhart, Esq. (klockhart@fkks.com)